IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ONSTREAM MEDIA CORPORATION,

                    Plaintiff,

        v.

VIDYO, INC.,

                    Defendant.

Case No. 1:22-cv-00069-RGA

Jury Trial Demanded

ANSWER TO COUNTERCLAIM

Plaintiff Onstream Media Corporation ("Plaintiff") answers the counterclaims of Defendant Vidyo, Inc. ("Defendant") as follows:

PARTIES

1. On information and belief, Plaintiff admits the allegations contained in Paragraph 1 of Defendant's Counterclaim.

2. Admitted.

JURISDICTION

3. Plaintiff incorporates by reference its answers in Paragraphs 1-2 above.

4. Admitted.

5. Admitted.

6. Plaintiff admits that venue is proper in this District. Plaintiff denies all remaining allegations contained in Paragraph 6 of Defendant's counterclaim.

COUNT I

DECLARATION REGARDING NON-INFRINGEMENT OF THE '068 PATENT

7.   Plaintiff incorporates by reference its answers in Paragraphs 1-6 above.

8.   Admitted.

9.   Denied.

10.   Plaintiff acknowledges that Defendant requests a declaration by the Court that Vidyo has not infringed and does not infringe, either directly or indirectly, under any theory of infringement, any claim of the '068 Patent. Plaintiff deniesany allegation that Defendant is entitled to such relief.

COUNT II

DECLARATION REGARDING NON-INFRINGEMENT OF THE '728 PATENT

11.   Plaintiff incorporates by reference its answers in Paragraphs 1-10 above.

12.   Admitted.

13.   Denied.

14.   Plaintiff acknowledges that Defendant requests a declaration by the Court that Vidyo has not infringed and does not infringe, either directly or indirectly, under any theory of infringement, any claim of the '728 Patent. Plaintiff denies any allegation that Defendant is entitled to such relief.

COUNT III

DECLARATION REGARDING NON-INFRINGEMENT OF THE '930 PATENT

15.   Plaintiff incorporates by reference its answers in Paragraphs 1-14 above.

16.   Admitted.

17.   Denied.

18.   Plaintiff acknowledges that Defendant requests a declaration by the Court that Vidyo has not infringed and does not infringe, either directly or indirectly, under any theory of infringement, any claim of the '930 Patent. Plaintiff denies any allegation that Defendant is entitled to such relief.

COUNT IV

DECLARATION REGARDING NON-INFRINGEMENT OF THE '648 PATENT

19.   Plaintiff incorporates by reference its answers in Paragraphs 1-18 above.

20.   Admitted.

21.   Denied.

22.   Plaintiff acknowledges that Defendant requests a declaration by the Court that Vidyo has not infringed and does not infringe, either directly or indirectly, under any theory of infringement, any claim of the '648 Patent. Plaintiff denies any allegation that Defendant is entitled to such relief.

COUNT V

DECLARATION REGARDING NON-INFRINGEMENT OF THE '109 PATENT

23.   Plaintiff incorporates by reference its answers in Paragraphs 1-22 above.

24.   Admitted.

25.   Denied.

26.   Plaintiff acknowledges that Defendant requests a declaration by the Court that Vidyo has not infringed and does not infringe, either directly or indirectly, under

any theory of infringement, any claim of the '109 Patent. Plaintiff denies any allegation

that Defendant is entitled to such relief.

COUNT VI

DECLARATION REGARDING NON-INFRINGEMENT OF THE '142 PATENT

27.   Plaintiff incorporates by reference its answers in Paragraphs 1-26 above.

28.   Admitted.

29.   Denied.

30.   Plaintiff acknowledges that Defendant requests a declaration by the Court

that Vidyo has not infringed and does not infringe, either directly or indirectly, under

any theory of infringement, any claim of the '142 Patent. Plaintiff denies any allegation

that Defendant is entitled to such relief.

COUNT VII

DECLARATION REGARDING NON-INFRINGEMENT OF THE '855 PATENT

31.   Plaintiff incorporates by reference its answers in Paragraphs 1-30 above.

32.   Admitted.

33.   Denied.

34.   Plaintiff acknowledges that Defendant requests a declaration by the Court

that Vidyo has not infringed and does not infringe, either directly or indirectly, under

any theory of infringement, any claim of the '855 Patent. Plaintiff denies any allegation

that Defendant is entitled to such relief.

COUNT VIII

DECLARATION REGARDING NON-INFRINGEMENT OF THE '833 PATENT

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35.   Plaintiff incorporates by reference its answers in Paragraphs 1-34 above.

36.   Admitted.

37.   Denied.

38.   Plaintiff acknowledges that Defendant requests a declaration by the Court that Vidyo has not infringed and does not infringe, either directly or indirectly, under any theory of infringement, any claim of the '833 Patent. Plaintiff denies any allegation that Defendant is entitled to such relief.

COUNT IX: DECLARATION REGARDING INVALIDITY

39.   Plaintiff incorporates by reference its answers in Paragraphs 1-38 above.

40.   Admitted.

41.   Denied.

42.   Plaintiff acknowledges that Defendant requests a declaration by the Court that the claimes of the Asserted Patents are invalid for failure to comply with one or more of the requirements of the United States Code, Title 35, including without limitation, 36 U.S.C. §§ 101, 102, 103, and 112, and the rules, regulations, and laws pertaining, thereto. Plaintiff denies that Defendant is entitled to such relief.

RRESPONSE TO DEFENDANT'S PRAYER FOR RELIEF

Plaintiff denies all remaining allegations not specifically admitted herein and denies that Defendant is entitled to any of the relief it has requested.

Dated: March 3, 2022

Respectfully submitted,

/s/ Richard C. Weinblatt
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